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**PARALEGAL**  
Maria Nunez, B.S.

January 13, 2023

The conference is adjourned until  
Thursday, February 9, 2023 at 11:30 A.M.  
Speedy trial time is excluded.

**SO ORDERED.**

**Via ECF**

Honorable Naomi Reice Buchwald  
United States District Court Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



NAOMI REICE BUCHWALD

UNITED STATES DISTRICT JUDGE

Dated: January 17, 2023  
New York, NY

Re: United States of America v. Juan Nolasco -Martinez, et al.  
22-CR-00008 (NRB),

Your Honor:

This office represents, the Defendant Juan Nolasco in the above-referenced matter which is next scheduled for conference before the Court on January 17<sup>th</sup>.

**By this letter, the Mr. Nolasco-Martinez respectfully requests an adjournment (with the consent of the Government) of the January 17<sup>th</sup> conference for a period of 24-30 days .** The parties are very close to entering into a plea agreement, but we are not there yet. My client is part of a pending 3 defendant wire case for which we am trying to work out a “companion” type plea with the AUSA assigned. There are also 1 or 2 other issues which need to be considered before entering the plea before your Honor

This request is consented to by AUSA Patrick Moroney. Both sides consent to, and request, the exclusion of time pursuant to the Speedy Trial Act.

The Court’s consideration of this request is respectfully appreciated. Thank you.

Yours truly,



John L. Russo (JR6200)

Cc: AUSA Patrick Moroney (**Via ECF**)  
Ms. Lauren N. Reisig, Esq.  
Law Clerk to the Hon. Naomi Reice Buchwald (**Via Email**)

